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UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

[Additional Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION,

This Document Relates to:

All Wave 1 Bellwether Cases

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED]
ORDER REGARDING PRODUCTION OF
DOCUMENTS IN ADVANCE OF WAVE
1 BELLWETHER DEPOSITIONS**

Judge: Hon. Lisa J. Cisneros
Courtroom: Courtroom G – 15th Floor

RECITALS

WHEREAS, the parties are interested in facilitating the prompt and efficient completion of Wave 1 bellwether depositions;

WHEREAS, in a joint status report submitted on July 21, 2025 and during the hearing held before the Court on July 25, 2025, the parties presented their respective positions regarding production of documents relating to such depositions a reasonable time before such depositions take place;

WHEREAS, during the hearing held before the Court on July 25, 2025, the Court expressed its view regarding what would constitute a reasonable period of time for production prior to such depositions;

WHEREAS, the parties acknowledge that there are existing requests for documents and information relating to Wave 1 bellwether depositions, which have been the subject of meet-and-confer discussions;

STIPULATION

NOW, THEREFORE, the parties hereby agree and request the Court enter the parties' stipulation as follows:

1. The party tendering the witness will produce at least three business days prior to any scheduled Wave 1 bellwether deposition documents relating to the deposition that have been requested by the deposing party, subject to meet-and-confer discussions.
2. If there is a dispute about the nature or extent of such production, the parties shall raise the dispute with the Court by joint letter no later than two business days prior to the scheduled Wave 1 bellwether deposition.

IT IS SO STIPULATED.

1 Dated: July 30, 2025

Respectfully submitted,

2 By: /s/ Laura Vartain Horn
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26 Dated: July 30, 2025

Respectfully submitted,

27 By: /s/ Roopal P. Luhana
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Co-Lead Counsel for Plaintiffs

ATTESTATION

Under Civil Local Rule 5-1(h)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 30, 2025

By: /s/ Laura Vartain Horn

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. LISA J. CISNEROS
United States Magistrate Judge